

**From:** [Casey Luckett](#)  
**To:** [Stephen Tzhone](#)  
**Cc:** [Carlos Sanchez](#); [Donald Williams](#); [Gloria-Small Moran](#); [John Meyer](#); [Jon Rauscher](#)  
**Subject:** Re: Arkwood Site  
**Date:** 05/17/2012 04:54 PM

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Just to clarify - the technical foundation for any ready for reuse determination we issue will be existing EPA documents for the site, including the corrected ices.. If new risk information is pertinent - which from John's email that doesn't appear to be the case - then that would be incorporated as well.

Thanks,  
Casey

Casey Luckett Snyder  
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-----Stephen Tzhone/R6/USEPA/US wrote: -----

To: Jon Rauscher/R6/USEPA/US@EPA, John Meyer/R6/USEPA/US@EPA  
From: Stephen Tzhone/R6/USEPA/US  
Date: 05/17/2012 11:13AM  
Cc: Carlos Sanchez/R6/USEPA/US@EPA, Donald Williams/R6/USEPA/US@EPA, Gloria-Small Moran/R6/USEPA/US@EPA, Casey Luckett/R6/USEPA/US@EPA  
Subject: Re: Arkwood Site

Hi Jon, John,

1) Followup from discussion, essentially, the PRPs are challenging several issues: role of Curt Grisham (landowner's son), deed restriction discrepancies, technical foundation for ready for reuse, technical foundation for partial deletion, and Agency non-coordination with PRP project coordinator. They have also called for a meeting for June/July to take steps to resolve these issues.

From what I understand from Carlos, Gloria will look into the challenges on the role of the landowner's son and any discrepancies in deed restrictions. I'll work with Casey and risk assessors to look into the challenges on the technical foundations for ready for reuse and partial deletion, along with improving coordination with the PRPs, if needed. There is also a separate technical matter involving a groundwater ozone injection pilot at the site... EPA Ada has assigned a SME to assist in that evaluation.


2) For background, attached are: the latest letter from PRPs, the last 5 year review, 1990 ROD, and maps from GIS for visuals:

*(See attached file: 2012-0510 ELG letter to G. Moran at EPA, Region 6 (00033100).PDF)*  
*(See attached file: Third Five Year Review.pdf)* *(See attached file: ROD - Arkwood.pdf)*  
*(See attached file: Arkwood\_site map.pdf)* *(See attached file: Arkwood\_site map\_expanded.pdf)*

Thanks,

Stephen L. Tzhone  
Superfund Remedial Project Manager

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 Stephen Tzhone---05/14/2012 05:30:44 PM---Hi Jon, John, I'm researching the technical foundation for two issues (i.e.: ready for reuse and par

From: Stephen Tzhone/R6/USEPA/US  
To: Jon Rauscher/R6/USEPA/US@EPA, John Meyer/R6/USEPA/US@EPA  
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Date: 05/14/2012 05:30 PM  
Subject: Re: Arkwood Site

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Hi Jon, John,

I'm researching the technical foundation for two issues (i.e.: ready for reuse and partial delisting) that have been controversial between the community and PRPs.

In my research, I reviewed a draft update (below) which states:

Chemical	PRG (10-6 or HQ = 1)	10-4 Level for Cancer PRG	Basis
PCP	2.7 mg/kg	270 mg/kg	Cancer
B(a)P	0.21 mg/kg	21 mg/kg	Cancer
2,3,7,8-TCDD	0.6 µg/kg	--	Non-cancer

'It seems under the latest industrial standards (PRGs) the soils remedy part can be deleted per the Risk Assessors...' and '...the entire site is covered with 6 inches of clean soil'.


**Question 1:** Does this table reflect the most current EPA industrial risk goals for soil?

**Question 2:** The 1990 ROD cleanup levels were: PCP 300 mg/kg, B(a)P 6.0 mg/kg, and 2,3,7,8-TCDD 20 µg/kg. When comparing these levels to the table, only B(a)P is within the risk range... was there a rationale for the others to be considered acceptable?

**Question 3:** How are soil exposure pathways eliminated in an industrial risk scenario, i.e. would 6 inches of clean topsoil suffice?

Thanks,

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 Shawn Ghose---05/14/2012 01:20:13 PM---The message is ready to be sent with the following file or link attachments:  
Partial Delisting2 cr

From: Shawn Ghose/R6/USEPA/US  
To: Stephen Tzhone/R6/USEPA/US@EPA  
Date: 05/14/2012 01:20 PM  
Subject: Emailing: Partial Delisting2 criteria.docx

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The message is ready to be sent with the following file or link attachments:

Partial Delisting2 criteria.docx

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*(See attached file: Partial Delisting2 criteria.docx)*

[attachment "2012-0510 ELG letter to G. Moran at EPA" removed by Casey Lockett/R6/USEPA/US]  
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[attachment "Third Five Year Review.pdf" removed by Casey Lockett/R6/USEPA/US]  
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